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January 23, 2019

Via ECF

The Honorable Edgardo Ramos United States District Judge, S.D.N.Y. 40 Foley Square New York, New York 10007

Re: <u>U.S. v. Paul Dean, et. al.</u>, 1:17-cr-00398-ER,

Permission for Late Filing of Sentencing Memorandum

Dear Judge Ramos:

I represent Paul Dean in the above captioned matter. As the Court is aware, Mr. Dean has previously pleaded guilty and was scheduled to be sentenced on January 31, 2019. The Court graciously adjourned this matter twice on Defendant Dean's request.

According to the Court's Individual Rules the sentencing memorandum for Mr. Dean was due 2 weeks before his sentencing date on or before January 17, 2019. I unfortunately did not see the two-week requirement until I was about to file Mr. Dean's memorandum late yesterday.

I am therefore asking the Court to accept the sentencing memorandum late, which will be filed as a separate docket entry. I apologize to the Court, and the Government, and I assure this Court that I was not trying to intentionally delay Mr. Dean's sentencing.

Respectfully Submitted,

Law Offices of Abe George, P.C.

<u>/s/ Abe George</u>_

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cc: All Parties by ECF